

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DONALD BELL; KATRINA BELL,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION NO. 2:05 CV 658-T
)	
TRAVELERS PROPERTY CASUALTY)	
INSURANCE COMPANY,)	
)	
Defendant.)	

JOINT MOTION TO EXTEND DEADLINES

COME NOW the Plaintiffs, Donald and Katrina Bell, and the Defendant, The Standard Fire Insurance Company, incorrectly identified in the Plaintiffs' complaint as Travelers Property Casualty Insurance Company ("Standard Fire"), and jointly move this Honorable Court to extend all deadlines in this matter by sixty (60) days for the following separate and several grounds:

1. The disposition motion deadline in this cause is February 14, 2006, and the discovery deadline is March 22, 2006.
2. The parties have conducted written discovery, and have worked diligently to schedule depositions in this case, but have been unable to complete discovery despite the parties' best efforts. One of the Plaintiffs, Donald Bell, routinely travels for business, and the parties have been unable to schedule a mutually convenient date for depositions as a result.
3. Counsel for the parties are working together to obtain available dates for the depositions. However, the Plaintiffs' counsel has informed the Defendant that, because of Mr. Bell's out-of-town business travel schedule, Mr. Bell is not available for deposition until after March 14, 2006, which is a month after the current dispositive motion deadline. Once the Plaintiffs have

been deposed, the parties expect that they will also need to conduct the depositions of numerous other fact witnesses identified by the parties in their Rule 26 disclosures.

4. Until the parties are able to conduct these depositions, the parties will not be in a position to determine if dispositive motions should be filed. Thus, the parties request that not only the discovery deadline be extended, but the dispositive motion deadline and all remaining deadlines also be extended.

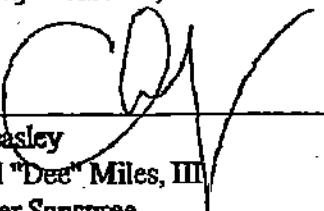
5. Assuming that this Court grants this motion for sixty (60) day extension, the new dispositive motion deadline would be April 17, 2006, and the new discovery deadline would be May 22, 2006.

6. The parties have not previously requested an extension of deadlines, and no party will be prejudiced by this first requested extension of time.

7. In addition, in order to permit the parties time to conduct the remaining discovery in this case, to determine the advisability of filing dispositive motions, to conduct a meaningful face-to-face settlement conference, and to meet all other deadlines currently set by this Court, the parties also respectfully request that the trial date of June 26, 2006 be moved to the next available trial docket for this Court, which the parties understand to be October 2, 2006.

WHEREFORE, for good cause shown, the Parties respectfully move this Honorable Court for an Order extending all deadlines by sixty (60) days and rescheduling the trial from June 26, 2006 to October 2, 2006.

Respectfully submitted,



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Respectfully submitted,



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